

This form is affected by the Privacy Act of 1974; See Privacy Act Statement before completing this form.

AGENCY

☐
☒FEPA
EEOC

CHARGE NUMBER

410-2022-03661

and EEOC

State or local Agency, if any

NAME (Indicate Mr., Ms., Mrs.)

Mr. Belter Castillo e-mail: devostated89@gmail.com

HOME TELEPHONE (Include Area Code)

678-538-7881

STREET ADDRESS

CITY, STATE AND ZIP CODE

721 Hemingway Lane

Roswell, GA 30075

DATE OF BIRTH

09/07/1989

NAMED IS THE EMPLOYER, LABOR ORGANIZATION, EMPLOYMENT AGENCY, APPRENTICESHIP COMMITTEE, STATE OR LOCAL GOVERNMENT AGENCY WHO DISCRIMINATED AGAINST ME (If more than one list below.)

NAME

Pandora Jewelry, LLC

NUMBER OF EMPLOYEES, MEMBERS

300+

TELEPHONE (Include Area Code)

(410) 309-0200

STREET ADDRESS

CITY, STATE AND ZIP CODE

250 W. Pratt Street

Baltimore, MD 21201

COUNTY

Baltimore City

NAME

Attn: Santo A. Scrimenti, Associate Legal Counsel

TELEPHONE NUMBER (Include Area Code)

(410) 309-0200

STREET ADDRESS

CITY, STATE AND ZIP CODE

COUNTY

EEOC RECEIVED 2022-07-08

CAUSE OF DISCRIMINATION BASED ON (Check appropriate box(es))

☐ RACE ☐ COLOR ☐ SEX ☐ RELIGION ☐ NATIONAL ORIGIN
☒ RETALIATION ☐ AGE ☐ DISABILITY ☐ OTHER (Specify)

DATE DISCRIMINATION TOOK PLACE

March 2022

☐ CONTINUING ACTION

THE PARTICULARS ARE (If additional paper is needed, attach extra sheet(s)):

- I. I, Belter Castillo, am the Charging Party to the particulars alleged herein. I became employed with the Respondent, Pandora Jewelry, LLC in February 2020 as a part-time sales associate at the company's Alpharetta, Georgia location.
- II. In June and July 2021, I witnessed my Store Manager, Ms. Devon Harris, making derogatory racial remarks concerning African American and Asian customers.
- III. I overheard Ms. Harris state that Asians and African Americans "always want a discount" and "that is the way "they [those races] are." Ms. Harris suggested that an Asian customer should "put a sticker on his forehead to appeal to Hindu shoppers".
- IV. From September through November 2021, Ms. Harris made unwelcomed, offensive, sexually lewd comments to me .
- V. Ms. Harris suggested that I target unsuspecting individuals for sexual overtures, and that I should carry wine with me if targeting "gay guys", because "gay guys like getting picked up".

[Page 1 of 2]

I want this charge filed with both the EEOC and the State or local Agency, if any I will advise the agencies if I change my address or telephone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.

NOTARY - (When necessary for State and Local Requirements)

I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.

I declare under penalty of perjury that the foregoing is true and correct.

SIGNATURE OF COMPLAINANT

07 / 08 / 2022

Date


Charging Party (Signature)SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE
(Day, month, and year)

EEOC Form 5 (11/09)

CHARGE OF DISCRIMINATION

This form is affected by the Privacy Act of 1974. See enclosed Privacy Act Statement and other information before completing this form.

Charge Presented To: Agency(ies) Charge No(s):

☐ FEPA
☒ EEOC

and EEOC

State or local Agency, if any

THE PARTICULARS ARE (If additional paper is needed, attach extra sheet(s)):

- VI. During September through November 2021 Ms. Harris asked me questions concerning my sexual orientation. Ms. Harris also discussed sexual acts and illicit behavior she has engaged in with individuals she met through on-line dating apps.
- VII. On or about February 10, 2022 I filed a complaint with Respondent's Human Resource Department complaining of Ms. Harris' inappropriate comments about race, color, ethnicity, religion as well her unwanted sex-based comments and gestures.
- VIII. On or about March 7, 2022, Respondent's Human Resource Generalist informed me that my complaints against Ms. Harris could not be substantiated.
- IX. On or about March 9, 2022, Ms. Harris threatened to terminate my employment by telling me that by filing a complaint against her I had "drawn a line in the sand".
- X. On March 17, 2022, I was contacted by Pandora's Human Resources Department and told that I was terminated effective immediately.
- XI. Ms. Harris' statement to me about "drawing a line in the sand" was an act of retaliation to dissuade me from filing future complaints about her, and an act of retaliation in violation of Title VII of the Civil Rights Act of 1964.
- XII. Pandora's termination of my employment was also an act of retaliation against me in violation of Title VII of the Civil Rights Act of 1964.

[Page 2 of 2]

I declare under penalty of perjury that the foregoing is true and correct.

Name: Belter Castillo

Signature:



Date: 07 / 08 / 2022